

Specifically, Applicants' claims 1 and 3 describe a fin for a heat exchanger comprising a plurality of waving strips, in which "adjacent waving strips are connected at connecting portions between said first flat portions of said adjacent waving strips and between said second flat portions of said adjacent waving strips, [wherein] a length (T) of each connecting portion in said longitudinal direction of each waving strip is less than or equal to about a thickness (t) of a plate forming each waving strip." (Emphasis added.) As described in Applicants' specification, a rolling process may be employed to manufacture Applicants' claimed fin because the connecting portion (T) is less than or equal to the plate thickness (t). In contrast, when the connecting length (T) is greater than the plate thickness (t), even if the plate is forcibly bent, the waving strips will become deformed during the manufacturing process. See, e.g., Appl'n, Page 9, Lines 27-30. As such, Applicants' claimed invention requires that the connecting length (T) be less than or equal to about the plate thickness (t).

The Office Action alleges that Applicants' perspective of JP-'484 (and Applicants' **Fig. 13** which corresponds to JP-'484) is inconsistent with Applicants' **Fig. 5**. Nevertheless, Applicants note that in Applicants' claimed invention, although the adjacent waving strips may overlap for a length which is greater than plate thickness (t), the adjacent waving strips only may be connected to each other over a portion of such overlapping length, i.e., only may be connected to each other at connection portions (T), the length of which is less than or equal to plate thickness (t). See, e.g., Appl'n, Page 5, Lines 13-18; and Fig. 5 (emphasis added.) Consequently, as noted by the Office Action, in Applicants' **Fig. 5**, connection portions (T) are depicted as corresponding to inside portions of the adjacent waving strips.

In contrast, as described above, **Fig. 5** of JP-'484 is addressed in Applicants' Background of the Invention Section, and corresponds to Applicants' **Fig. 13**. See, e.g., Appl'n, Page 2, Line 10. JP-'484 describes a plurality of waving strips 102 and 103 which are arranged adjacent to, and longitudinally offset from, each other. Adjacent strips 102 and 103 overlap with each other at adjacent raised portions and adjacent depressed portions. Adjacent strips 102 and 103 also are connected to each other throughout the entire overlapping length of adjacent strips 102 and 103. Consequently, as noted by the Office Action, the connection portions in Applicants' **Fig. 13** are depicted as corresponding to outside portions of waving strips 102 and 103. Specifically, the connection length of these connections portions is about L/2, in which L is the length of each raised portion, and also is the length of each depressed portion. As such, the

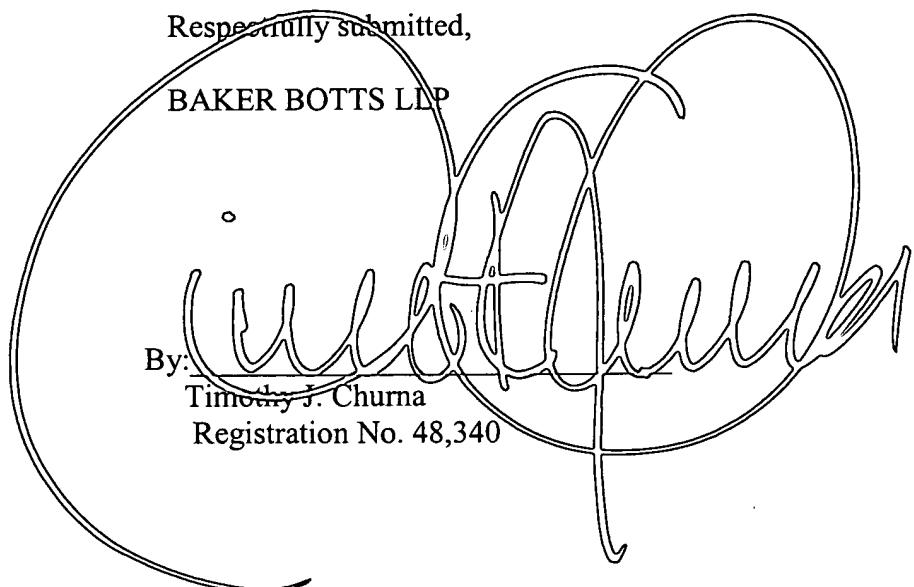
connection length of the connection portions described in JP-'484 is about 1/2 of the length of the raised portion, which is substantially greater than a thickness of the waving strips 102 and 103. (Emphasis added.) Moreover, because the connection portion is substantially greater than the thickness of the waving strips 102 and 103, the waving strips 102 and 103 cannot be formed by a rolling method without deforming the waving strips 102 and 103. Consequently, waving strips 102 and 103 must be formed by a die press fitting method. See, e.g., Appl'n, Page 2, Lines 8-31. Thus, JP-'484 fails at least to describe a fin for a heat exchanger comprising a plurality of waving strips, in which "adjacent waving strips are connected at connecting portions between said first flat portions of said adjacent waving strips and between said second flat portions of said adjacent waving strips, [wherein] a length (T) of each connecting portion in said longitudinal direction of each waving strip is less than or equal to about a thickness (t) of a plate forming each waving strip," as described in original claims 1 and 3. Therefore, Applicants respectfully request that the Examiner withdraw the anticipation rejections of claims 1 and 3 in view of JP-'484.

Claims 2 and 4-6 depend from original claims 1 and 3, respectively. Therefore, Applicants respectfully request that the Examiner also withdraw the anticipation rejections of claims 2 and 4-6 in view of JP-'484.

CONCLUSION

Applicants respectfully submit that this application is in condition for allowance, and such disposition is earnestly solicited. If the Examiner believes that an interview with Applicants' representatives, either in person or by telephone, would expedite prosecution of this application, we would welcome such an opportunity. Applicants believe that no fees are due as a result of this responsive amendment. Nevertheless, in the event of any variance between the fees determined by Applicants and those determined by the U.S. Patent and Trademark Office, please

charge any such variance to the undersigned's Deposit Account No. 02-0375.



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